

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

BOBBY GARRISON,

PLAINTIFF,

-VS-

MONTGOMERY COUNTY BOARD
OF EDUCATION, ET AL.

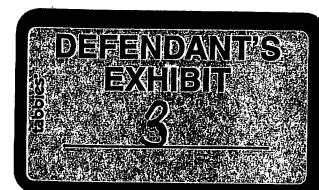
DEFENDANTS.

CASE No. 2:05-cv-549-A

AFFIDAVIT OF MARK CASILLAS

Before me, the undersigned authority, in and for said county and state, personally appeared Mark Casillas, who being known to me and being first duly sworn, deposes and says under oath as follows:

1. My name is Mark Casillas. I am a Hispanic male over the age of nineteen and I have personal knowledge of the matters set forth herein.
2. I am a Support Personnel Specialist for Montgomery Public Schools.
3. I know Bobby Garrison who was employed by the Board as a Laborer I.
4. Carlinda Purcell has been Superintendent of Montgomery Public Schools since approximately December 2004. During the time period that Bobby Garrison was employed with Montgomery Public Schools, Clinton Carter was Superintendent.
5. Jimmy Barker is Assistant Superintendent of Human Resources for Montgomery Schools. He is a black male.



6. Donald Dotson was Director of Logistics from October 1999 to July 2003. Dotson is a black male. Jacky Todd has been Director of Logistics since July 2003.
7. Following a complaint by Garrison in December 2004, Jimmy Barker assembled a meeting on January 7, 2004 with Garrison, Jerry Morris, Jacky Todd, Barker and me. Following that meeting, I personally conducted interviews of twenty-two employees in the Logistics Department to investigate Garrison's claims regarding discriminatory practices. Fourteen of the employees I interviewed were African-American. I interviewed Betty Smith, a black female who was a part of the three member committee who interviewed candidates for a Laborer III position in November 2003. She told me that she ranked Garrison lowest among the candidates. I completed a report detailing my findings and provided it to Jimmy Barker. The results of my investigation revealed that Mike Strength had an abrasive personality, but that it was unrelated to race. Both white and black employees complained of the way he spoke to them. Similarly, both white and black employees complained of Garrison's demeanor and reported that he was bossy and difficult to work with.
8. Independent of my investigation, employees complained to me that Garrison was difficult to work with and not a team player.
9. Garrison's position in Logistics was filled by Lisa M. Brown, a black female.

Further affiant saith not.



MARK CASILLAS

STATE OF ALABAMA)
COUNTY OF MONTGOMERY)

Before me the undersigned Notary Public in and for State and County aforesaid, personally appeared **MARK CASILLAS**, who is personally known to me and who, being by me first duly sworn, doth depose and say that he signed the above affidavit to the best of his knowledge, information and belief and with full understanding of its effect.



NOTARY PUBLIC

(SEAL)

My Commission Expires: 11-25-07